

Political Spending Policy & Disclosure

Disclosure of Political Activity

Windstream's Policy on Oversight and Transparency for Political Spending

Windstream's Board of Directors oversees corporate political spending. At least annually, Windstream will brief its Governance Committee on the company's corporate political activity, including the spending of treasury funds and/or funds from the Windstream Corporation political action committees. Further, prior to funding any independent expenditure, Windstream shall obtain the approval of its Governance Committee.

Windstream is committed to transparency in its political activities. The company complies with federal and state regulatory reporting requirements, including required filings made with the Federal Election Commission (FEC) and analogous state entities. This information is supplemented by voluntary disclosures on the Investor Relations website, thus offering shareholders and the public a comprehensive view of Windstream political activity.

Windstream has not funded independent expenditures and does not plan to fund independent expenditures as part of its political program. Consistent with its commitment to transparency, Windstream will be fully transparent if it funds independent expenditures in the future.

Windstream also provides transparency on its major trade association memberships. The company will post on its website the name of all trade associations receiving more than \$50,000 a year in Windstream membership dues. In addition, for trade associations that are not primarily engaged in telecommunications regulatory matters, Windstream will provide the annual payment amount for the preceding year.

Windstream is active in the governance of its major trade associations and encourages them to provide transparency for their political campaign contributions and to decline to make independent expenditures. The company does not, however, condition membership in a group or association based on the group or association's policy on reporting independent expenditures.

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Windstream is committed to transparency in its political activity. Following is an accounting of the company's efforts in 2018.

Campaign contributions - Windstream made no corporate contributions to candidates or political parties in 2018.

During 2018, Windstream had two political action committees (PACs), each funded 100% with voluntary contributions from employees. The Arkansas PAC operates exclusively in that state. The Windstream Corporation PAC contributes to candidates for the U.S. Senate and House of Representatives, and also makes contributions to state and local candidates, where permitted. During 2018, the two PACs contributed approximately \$8,500 to Congressional candidates; \$70,700 to state and local candidates;

and \$2,000 to the PACs of state telecom associations. Detailed information on the activity of both PACs is available online:

- [Federal Election Commission](#)
- [Arkansas Secretary of State](#)

Independent expenditures – Windstream made none in 2018.

Trade associations – Outside of telecom, Windstream has no major memberships. A major membership is defined as at least \$50,000 in annual dues.

In 2018, Windstream paid at least \$50,000 to three organizations that focus on telecom regulatory and policy issues:

- the United States Telecom Association,
- INCOMPAS, and
- the Pennsylvania Telephone Association.

These organizations focus narrowly on telecom regulatory matters. For competitive reasons, Windstream does not itemize its dues payments to such groups. Windstream is active in the governance of its major trade associations and encourages them to provide transparency for any political campaign contributions and to decline to make independent expenditures.